

**EXHIBIT C**

**Select pages from Rudy Chacon's deposition transcript**

In the Matter of:

*Dimitrov*

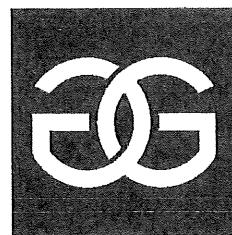
vs

*Stavatti Aerospace*

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*Rudy Chacon*

*January 21, 2025*



**GRIFFIN GROUP  
INTERNATIONAL**

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3200 East Camelback Road, Suite 177  
Phoenix, Arizona 85018

Dimitrov vs  
Stavatti Aerospace

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<p>1 I met him.</p> <p>2 Q. Sure. Over the course of that time, the 20 to 30</p> <p>3 years, as you say, did you ever work with Mr. Colvin?</p> <p>4 A. We worked on funding projects often. You know, he</p> <p>5 would call and say, hey, I have a real estate project in Chino,</p> <p>6 and I'm sending you a package, and look and see if you have</p> <p>7 anybody that's interested. But we didn't -- we never</p> <p>8 consummated a deal.</p> <p>9 Q. Did you ever work together collectively within a</p> <p>10 single entity?</p> <p>11 A. No.</p> <p>12 Q. Are you a registered broker dealer with the Securities</p> <p>13 and Exchange Commission?</p> <p>14 A. No.</p> <p>15 Q. Do you know if Mr. Colvin is a registered broker</p> <p>16 dealer with the Securities and Exchange Commission?</p> <p>17 A. I don't believe so.</p> <p>18 Q. Okay. Have you ever been employed by Stavatti?</p> <p>19 A. No.</p> <p>20 Q. Have you ever been engaged for services by Stavatti?</p> <p>21 A. No.</p> <p>22 Q. Did you ever provide any services to Stavatti?</p> <p>23 A. No.</p> <p>24 Q. How would you characterize the service that you</p> <p>25 provided by way of Mr. Colvin?</p>	<p>1 Q. To your knowledge, was Mr. Colvin an equity holder in</p> <p>2 that company?</p> <p>3 A. I believe he was.</p> <p>4 Q. To your knowledge, did Mr. Colvin hold any equity in</p> <p>5 any other companies besides the MARS drone company at the time</p> <p>6 which you were facilitating for him to receive an investment?</p> <p>7 A. I believe he owned his own companies.</p> <p>8 Q. And what companies did he lead you to believe that he</p> <p>9 owned?</p> <p>10 A. He had -- he had an operating company that he operated</p> <p>11 out of, so...</p> <p>12 Q. And how do you know that?</p> <p>13 A. I think we discussed -- discussed it.</p> <p>14 Q. Were you discussing it in a business sense?</p> <p>15 A. There may have been some tax, you know, questions that</p> <p>16 he had or something of that nature, and I -- I would have</p> <p>17 answered the tax stuff.</p> <p>18 Q. What was the name of the entity, if you can recall?</p> <p>19 For the record, please state what you're trying to</p> <p>20 reference there.</p> <p>21 A. I'm trying to look on my phone and see if there's a</p> <p>22 company associated with Brian.</p> <p>23 Yeah. There was one company. Mask Industries, LLC.</p> <p>24 Q. And do you know where Mask Industries, LLC, was based?</p> <p>25 A. I believe it was in Ventura.</p>
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<p>1 A. I made an introduction to Valentino.</p> <p>2 Q. And is that the only introduction that you made?</p> <p>3 A. No.</p> <p>4 Q. Did you make other introductions on behalf of Stavatti</p> <p>5 for Mr. Colvin?</p> <p>6 A. Never was on behalf of Stavatti. It was behalf of my</p> <p>7 pool of investors that were interested in participating in</p> <p>8 something.</p> <p>9 Q. Over the years of working with Mr. Colvin, had you</p> <p>10 ever validated his credentials with any of the third parties</p> <p>11 that he'd ever worked with?</p> <p>12 A. Yes.</p> <p>13 Q. And had you ever seen any inaccuracies in the past</p> <p>14 from him?</p> <p>15 A. No, because there were never ever -- ever, like,</p> <p>16 official designations, you know. I'd met him at MARS, a drone</p> <p>17 company. I went to the drone company, saw the -- the</p> <p>18 operations, met with the other principals there. So it was that</p> <p>19 kind of thing where... 888.529.9990   602.264.2230</p> <p>20 Q. Where is MARS drone company based?</p> <p>21 A. It was in Fullerton.</p> <p>22 Q. California?</p> <p>23 A. Yeah.</p> <p>24 Q. And were you ever an equity holder in that company?</p> <p>25 A. No.</p>	<p>1 Q. California?</p> <p>2 A. Yes.</p> <p>3 Q. Any other entities that you know of that Brian Colvin</p> <p>4 operated under or that you provided any services or advice to?</p> <p>5 A. I'm sure there was, but that's over 20 -- 20, 30</p> <p>6 years, so long time.</p> <p>7 Q. Over the course of that time, had Mr. Colvin ever</p> <p>8 misled you as it pertained to any investments with any of the</p> <p>9 companies he was soliciting for?</p> <p>10 A. No.</p> <p>11 Q. At the time he brought the Stavatti opportunity to</p> <p>12 you, how did he present it?</p> <p>13 A. That he was working with Stavatti, and Stavatti was</p> <p>14 going to be using DelMorgan as an investment banker to raise</p> <p>15 funds, and it was a short note that they needed just to get --</p> <p>16 get a short period of time, funding for that period of time. So</p> <p>17 that's -- that was -- that was the main opportunity. And then I</p> <p>18 investigated DelMorgan, and DelMorgan proved out to be a real --</p> <p>19 a real company. 602.264.2230</p> <p>20 Q. And had you ever worked with DelMorgan investment bank</p> <p>21 previously?</p> <p>22 A. No.</p> <p>23 Q. Had Mr. Colvin ever presented DelMorgan as an</p> <p>24 associate of his or an organization he was working with in the</p> <p>25 past?</p>



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1 A. No.	1 the aggregate, I guess, amount of the value that you provided to
2 Q. At any point in your conversations with Mr. Colvin at	2 Stavatti?
3 that time, did he characterize himself or his role with	3 A. Probably 25...
4 Stavatti?	4 Q. Let the record reflect that Mr. Chacon is referencing
5 A. It was always evolving. He was -- you know, he was	5 his phone again.
6 going to help them with the drone side. He was helping them	6 A. I'm trying to add up... Probably another \$100,000.
7 with marketing. <sup>Max Chacon</sup> He was helping them with a lot of things. So	7 Maybe -- no. I have another one. <sup>Max Chacon</sup> Yeah, between 100 and
8 at -- depending upon where they were in the -- in the	8 150,000.
9 fundraising or getting contracts, trying to get contracts or get	9 Q. And what's that other one you referenced?
10 people with various clearances and things.	10 A. My son invested \$5,000. Another guy invested 17,000,
11 I mean, I know that he went to some type of diplomat	11 something like that. 13 or 17,000.
12 school. He actually went to a diplomat school, from what I	12 Q. And who's that individual who invested the 17K?
13 understood, in order to represent Stavatti in various contracts.	13 A. That is -- I don't remember the name right off the top
14 Q. And to your knowledge, was Mr. Colvin ever compensated	14 of my head.
15 by Stavatti?	15 Q. For the record, is Max Chacon your son --
16 A. I don't know of any -- any compensation.	16 A. Yeah.
17 Q. Are you currently a shareholder or a stockholder of	17 Q. -- who held that interest?
18 Stavatti?	18 A. Yes.
19 A. No.	19 Q. Are you aware of any interest held by somebody named
20 Q. Have you ever been a shareholder or stockholder --	20 Ann Rogers (phonetic)?
21 A. No.	21 A. Yeah. Ann Rogers was, I think, around 17,000, maybe
22 Q. -- of Stavatti?	22 more. 24 or 17.
23 Have you ever made a capital investment in Stavatti?	23 Q. How about the name Brian Ardez (phonetic)?
24 A. Yes.	24 A. Yeah. That's the -- that's the other individual.
25 Q. And what was the date of that investment?	25 Q. Who also had 17,000?
Page 19	Page 21
1 A. I'd have to look up the date.	1 A. 13,5 or something like that. I think 13,5.
2 Q. Approximate.	2 Q. The name Jim Rappalo (phonetic)?
3 A. It would have been February, March of 2022.	3 A. Yes. He was about 25,000.
4 Q. And how much did you invest in Stavatti?	4 Q. And did you buy Mr. Rappalo out as well?
5 A. Well, I had, I think, 125,000 initially, and then,	5 A. No.
6 like, another 100,000. And then some of the investors that I	6 Q. To your knowledge, is he still an active holder of --
7 had brought in, small investors, I purchased their position,	7 A. Yeah.
8 so...	8 Q. Okay.
9 Q. And what are the names of those small investors whose	9 A. He's waiting for his money, like everybody else.
10 positions you purchased?	10 Q. How about Ted Nash?
11 A. Osgood was one of them, and Joe Lai was another one.	11 A. Ted Nash was a short-term. I believe it was 20,000, I
12 Q. Can you stay the last name on the record, please?	12 think.
13 A. Joe Lai.	13 Q. Was Mr. Nash a noteholder?
14 Q. Can you spell that last name?	14 A. Yeah, but I bought Ted Nash out.
15 A. L-A-I.	15 Q. Okay. Phillip Milgram?
16 Q. And is the Osgood that you're referencing Sergeant	16 A. Yes.
17 Osgood?	17 Q. And how much did Mr. Milgram hold?
18 A. Yes.	18 A. I want to say 20,000.
19 Q. Thank you.	19 Q. And did you buy Mr. Milgram's interest?
20 And what were their interests in value each?	20 A. No.
21 A. Osgood was probably around \$6,000. I think he made	21 Q. And to your knowledge, Mr. Milgram is still --
22 two -- two different times that he -- he went in. And then -- I	22 A. Yes.
23 mean, I could get you a list.	23 Q. -- an equity -- or a creditor, I should say.
24 Q. I believe that we requested one already.	24 Superior, Inc.?
25 But taking a look at these smaller investors, what is	25 A. Yeah. That -- that is me.



<p style="text-align: right;">Page 22</p> <p>1 Q. And is that the only company with which you held your 2 interest in any transactions with Stavatti?</p> <p>3 A. The last contract may have been done in Advanced 4 Technology Holdings.</p> <p>5 Q. And where is Defense Technology Holdings based out of?</p> <p>6 A. Advanced Technology Holdings.</p> <p>7 Q. If it's -- okay. So you did say Advanced. 8 A. Yeah.</p> <p>9 Q. So that's the one in Las Vegas. Thank you.</p> <p>10 Did you purchase Mr. Ardez's interest in Stavatti?</p> <p>11 A. No.</p> <p>12 Q. And to your knowledge, he's still a creditor of the 13 corporation?</p> <p>14 A. Yes.</p> <p>15 Q. And then how about Ann Rogers' interest? Did you ever 16 purchase that?</p> <p>17 A. I'd have to verify whether I did or not.</p> <p>18 Q. Was there a reason why you purchased all of these 19 investors' interests?</p> <p>20 A. They were small investors that were having financial 21 difficulties because of the COVID and things like that, and I 22 just tried to do whatever I could do.</p> <p>23 Q. And had you ever received any return on your 24 investment from Stavatti?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 24</p> <p>1 A. I -- I don't know of any right now, currently, but I 2 mean, I'm sure that's what he did. That's -- you know, if he 3 had a real estate project that somebody approached him and he 4 could pair -- match up somebody, then he would -- he would do 5 that. So I'm assuming that he does that. I don't know of 6 anything that he has or hasn't done.</p> <p>7 Q. But he did reach out to you subsequent to the 8 initiation of this lawsuit to ask you if you had any sort of 9 mutual connections that could facilitate him funding another 10 company?</p> <p>11 MR. DUNMIRE: Objection.</p> <p>12 THE WITNESS: I can't think of a company that he 13 approached me with.</p> <p>14 BY MR. CHEBAT:</p> <p>15 Q. When you spoke to -- at any time when you spoke to 16 Mr. Colvin after the initiation of this lawsuit, did funding a 17 third-party company come up on that conversation?</p> <p>18 A. I don't believe so, but it could have.</p> <p>19 Q. And did you do anything to facilitate his ability to 20 raise funds for any other companies?</p> <p>21 A. No.</p> <p>22 Q. Have you facilitated for Mr. Colvin in his fundraising 23 efforts since the inception of this case?</p> <p>24 A. No.</p> <p>25 Q. Okay. Other than the list that we previously</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. And at the point that you purchased all the other 2 interests -- all the other third parties' interests in Stavatti, 3 had you ever received a return on your investment in Stavatti?</p> <p>4 A. No.</p> <p>5 Q. And to this day --</p> <p>6 A. No.</p> <p>7 Q. -- have you ever received any interest on your -- 8 thank you.</p> <p>9 You previously mentioned a long-standing relationship 10 with Mr. Colvin. How would you characterize your relationship 11 currently with Mr. Colvin?</p> <p>12 A. We're not communicating because of the attorneys, you 13 know, that we have, the legal -- legal situation that we're in.</p> <p>14 Q. And have you spoken to him since being served with 15 this lawsuit?</p> <p>16 A. Yeah. I'm sure I have.</p> <p>17 Q. And what was the nature of that discussion?</p> <p>18 A. Could have been a deal that he had or I was asking 888.529.9990   602.264.2230 19 him, you know, what does he know about Stavatti, if he knows 20 anything about Stavatti. Is there any progress on the loans 21 that they were going to try to do on the property to be able to 22 pay back Valentino?</p> <p>23 Q. And so despite the existing litigation, you believe 24 that Mr. Colvin is still out actively soliciting investment on 25 behalf of third-party companies?</p>	<p style="text-align: right;">Page 25</p> <p>1 discussed of the -- as you called them, smaller investors, are 2 there any other investors that you referred to Stavatti?</p> <p>3 MR. DUNMIRE: What was the question, please?</p> <p>4 BY MR. CHEBAT:</p> <p>5 Q. Other than the previously-referenced small investors 6 as Mr. Chacon referenced them, were there any other investors 7 that Mr. Chacon introduced to Stavatti?</p> <p>8 A. I don't believe there were any that were actually 9 introduced. I mean, I probably had spoken to 20 other people 10 that -- to see if there was any interest or anything.</p> <p>11 Q. And did you ever receive any compensation of any sort 12 for --</p> <p>13 A. No.</p> <p>14 Q. -- for -- okay. I'd just like to complete the 15 question.</p> <p>16 Did you ever receive any compensation for any of the 17 services that you provided to either Brian Colvin or Stavatti?</p> <p>18 A. No.</p> <p>19 Q. How did you communicate with Valentino Dimitrov about 20 Stavatti and its entities?</p> <p>21 A. Probably over the phone and personally.</p> <p>22 Q. And what was the nature of those discussions?</p> <p>23 A. It would have been describing the Stavatti 24 opportunity.</p> <p>25 Q. And where did you get the information to describe the</p>

<p>Page 26</p> <p>1 Stavatti opportunity?</p> <p>2 A. From Brian Colvin.</p> <p>3 Q. Exclusively?</p> <p>4 A. Yeah.</p> <p>5 Q. From Brian Colvin?</p> <p>6 A. Yeah.</p> <p>7 Q. And as it pertains to all the other investors that you 8 had introduced, were all of those transactions facilitated by 9 Brian Colvin?</p> <p>10 A. Yes.</p> <p>11 Q. And other than this transaction -- "this transaction" 12 being the one with Valentino Dimitrov -- have -- has Brian 13 Colvin, to your knowledge, received any sort of compensation or 14 benefit from his fundraising efforts for Stavatti?</p> <p>15 A. I'm not aware of anything that he received directly. 16 The only thing that I knew was that the 900,000 went into 17 Stavatti account number one, and the 100,000 went into the 18 Stavatti UAV account, from what I understood. But they were 19 both Stavatti accounts.</p> <p>20 Q. Did you have any visibility into any of those 21 accounts?</p> <p>22 A. No.</p> <p>23 Q. And to your knowledge, the full amount was deposited 24 by Mr. Colvin, correct?</p> <p>25 A. I went to the bank and made the deposit.</p>	<p>Page 28</p> <p>1 slip said 900,000 and 100,000.</p> <p>2 Q. And you saw those deposit slips?</p> <p>3 A. Yes.</p> <p>4 Q. Did you author those deposit slips? Did you write 5 them?</p> <p>6 A. I don't remember if I actually wrote them or not.</p> <p>7 Q. So they could have been <sup>Rudy Chacon</sup></p> <p>8 A. He probably wrote them, because it was -- you know, 9 his Stavatti account. I didn't have the -- the account 10 information.</p> <p>11 Q. Do you have any knowledge what happened to the money 12 that was deposited into the Stavatti UAV account?</p> <p>13 A. From my questions, they were using it at the Niagara 14 Falls facility, and they were using it -- I don't know if those 15 funds were used with DelMorgan, also. It was around \$100,000 16 that was paid to DelMorgan from what I understood, but I 17 factually don't know.</p> <p>18 MR. DUNMIRE: Rudy, I would just direct you to 19 not speculate on answers if you don't know the answer.</p> <p>20 THE WITNESS: Yeah. I --</p> <p>21 MR. DUNMIRE: I don't want you to speculate and 22 say an answer because you believed Brian, for example.</p> <p>23 THE WITNESS: Right. I have no information about 24 where the funds went.</p> <p>25 ...</p>
<p>Page 27</p> <p>1 Q. You made the deposit?</p> <p>2 A. Yeah. With Brian Colvin.</p> <p>3 Q. Okay. And at which bank location did you make that 4 deposit?</p> <p>5 A. That was Bank of America San Pedro.</p> <p>6 Q. And upon deposit, the -- just to confirm, upon 7 deposit, the amount was bifurcated with 100,000 in the UAV 8 account, and the remainder 900,000 in the other Stavatti 9 account, correct?</p> <p>10 A. Correct.</p> <p>11 Q. To your knowledge, did Mr. Colvin have signature 12 authority on either one of those accounts?</p> <p>13 A. I don't know. I don't know.</p> <p>14 Q. What was the nature of your conversation with 15 Mr. Colvin on that day leading up to the deposit?</p> <p>16 A. We're going to go deposit the money. That was 17 basically the entire -- I mean, there wasn't any conversation 18 about it, because, I mean, I wasn't -- I wasn't made aware of Group 19 where the funds were going to be used immediately or anything 20 like that, so I didn't -- wasn't my -- wasn't my...</p> <p>21 Q. So how do you know the way they were bifurcated?</p> <p>22 Would you like to pause?</p> <p>23 A. No. I'm just...</p> <p>24 Q. How do you know the way --</p> <p>25 A. Because -- because of the deposit, when the deposit</p>	<p>Page 29</p> <p>1 BY MR. CHEBAT:</p> <p>2 Q. But to the best of your knowledge, the full 1,000,000 3 ended up in accounts that had the Stavatti name on them?</p> <p>4 A. Yes.</p> <p>5 Q. Had you ever discussed any other potential investment 6 opportunities with Mr. Dimitrov?</p> <p>7 A. It's possible, but I don't recall any specific thing.</p> <p>8 Q. Was there any other investment opportunities that were 9 presented to Mr. Dimitrov that you'd ever facilitated?</p> <p>10 A. Can't remember.</p> <p>11 Q. Did you ever make representations to Mr. Dimitrov 12 about Stavatti's financial condition?</p> <p>13 A. I don't believe so. No.</p> <p>14 Q. Did you ever make any representations about its 15 ability to repay investors or creditors?</p> <p>16 A. It would be in reference to DelMorgan being a 17 legitimate firm that was going to be raising the money.</p> <p>17 Q. And so other than that investment strategy of working 18 602.264.2230 19 through DelMorgan, did you ever discuss Stavatti's business 20 plans as you understood them with Mr. Dimitrov?</p> <p>21 A. I don't recall.</p> <p>22 Q. Did you ever discuss any specific investment 23 opportunities related to the hovercraft or Superior Fulcrum or 24 anything like that?</p> <p>25 A. No. I wouldn't have had the direct knowledge of that.</p>

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1 Q. In your responses in discovery, you stated that you  
 2 were advising one of Stavatti's investment opportunities which  
 3 had received two brokerage firm responses of \$17 million each or  
 4 17 million each.

5 MR. DUNMIRE: Objection.

6 BY MR. CHEBAT:

7 Q. What was that in reference to?

8 A. I believe I had spoken to Brian, and he had mentioned  
 9 that they had had a meeting with DelMorgan, and DelMorgan was  
 10 saying that they had these two responses from companies that  
 11 potentially were going to place bonds, and then I believe in  
 12 that email I said Stavatti was going to update Valentino on the  
 13 status.

14 Q. Are you aware of what two brokerage firms they were  
 15 speaking of?

16 A. They may have mentioned them to me, but I didn't  
 17 know -- didn't know them anyway.

18 Q. To your knowledge, has Stavatti ever created any sort  
 19 of commercially viable aircraft?

20 A. I don't know for sure if it was aircraft or space  
 21 satellite stuff. I know that Chris was supposedly involved with  
 22 a lot of the secret military stuff.

23 Q. To your knowledge, does Mr. Beskar hold a security  
 24 clearance?

25 A. I don't know.

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1 Q. To your knowledge, has Stavatti ever generated revenue  
 2 from the sale of any product they have manufactured?

3 A. I don't know if they have or haven't.

4 Q. Coming back to your interest in Stavatti, are you  
 5 currently a shareholder of Stavatti?

6 A. No.

7 Q. Do you have any of your creditor rights memorialized  
 8 in writing with Stavatti?

9 A. The contract?

10 Q. Sure.

11 A. Yeah.

12 Q. And what's the prevailing interest rate on those?

13 A. It's the same conditions has -- same terms as  
 14 Valentino's and the other investors.

15 Q. So you entered into the same agreement?

16 A. Yeah. It's the same -- same -- same agreement.

17 Q. And who executed the agreement that you -- that you're  
 18 a party to?

19 MR. DUNMIRE: If you know.

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20 THE WITNESS: Well, I know who it says on the  
 21 contract, but I don't know who actually did it.

22 BY MR. CHEBAT:

23 Q. Who's listed on the contract? Who's --

24 A. Chris Beskar.

25 Q. Thank you.

1 And on all of the smaller investors whose notes you  
 2 purchased, was that ever memorialized in writing as well?  
 3 A. Every single person had an NDA and then had a contract  
 4 issued, and then we would make a deposit into the account or I  
 5 would give a check to Brian, and then we would have --  
 6 everything would be signed and...

7 Q. And every time you acquired one of those smaller  
 8 interests, there was a contract as well, correct?

9 A. Oh, yeah.

10 Q. And were all of those contracts the same as the one  
 11 that you entered?

12 A. Yeah. Basically the same. Same thing.

13 Q. And to your knowledge, were they all executed by  
 14 Christopher Beskar?

15 A. Yes.

16 Q. Are you familiar with Stavatti's business operations?

17 A. No.

18 Q. And so you were merely investing in a company without  
 19 any knowledge of its business operations?

20 A. Well, I was relying primarily on DelMorgan. So it  
 21 didn't matter if the business was a success not. If DelMorgan  
 22 funded as it was proposed to do, then we would be out before  
 23 there was any operation. So that -- that was the promise for  
 24 the investment.

25 Q. Do you know the name of the individual you spoke with

1 at DelMorgan?

2 A. I didn't speak to anyone at DelMorgan. DelMorgan --  
 3 DelMorgan is a firm that -- in Santa Monica that through my due  
 4 diligence and talking to other people -- you know, is this a  
 5 real investment banking firm.

6 Q. And what type of due diligence did you conduct on  
 7 DelMorgan?

8 A. Searching the internet, looking for articles about  
 9 them, looking at funding that they had done for multiple  
 10 aerospace companies. They had their website. And talking to  
 11 some other -- other people who had dealt with them.

12 Q. And who were those third parties who had dealt with  
 13 them?

14 A. There were just business -- business associates or  
 15 contacts that I had.

16 Q. What are the -- do you know the names?

17 A. Primarily they do public offerings or raising money.

18 Q. So they were more in the public market doing Reg Ds, doing  
 19 things of that nature.

20 Q. And so from your -- from your due diligence efforts,  
 21 you found that DelMorgan was a real investment bank, and  
 22 therefore, you were all right with making an investment in a  
 23 company which you knew nothing about the business operations of?

24 A. Yes.

25 Q. Due to the legitimacy of a potential third-party

